

ESTTA Tracking number: **ESTTA692903**

Filing date: **09/01/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92061934
Party	Defendant Townsquare Commerce, LLC
Correspondence Address	TOWNSQUARE COMMERCE LLC 1851 NORTH GREENVILLE AVE , SUITE 100 RICHARDSON, TX 75081 UNITED STATES
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Darlene Ghavimi
Filer's e-mail	dghavimi@conleyrose.com
Signature	/dfghavimi/
Date	09/01/2015
Attachments	Consent Motion to Extend Answer.pdf(92915 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of U.S. Trademark Reg. No. 3,895,241 (SEIZE THE DEAL)  
Registered: December 21, 2010

GROUPON, INC.

Petitioner,

v.

TOWNSQUARE COMMERCE, LLC,

Registrant.

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Cancellation No. 92061934

**CONSENT MOTION TO EXTEND ANSWER DATE**

Registrant Townsquare Commerce, LLC (“Townsquare”), and Petitioner Groupon, Inc. (“Groupon”) have agreed to extend Townsquare’s date by which to Answer Groupon’s Petition for Cancellation by 30 days. All other dates are to remain unchanged. Accordingly, the parties respectfully request an extension for Townsquare’s Answer date only from September, 8, 2015 through and until October 8, 2015. The proposed dates are listed below:

Time to Answer	10/8/2015
Deadline for Discovery Conference	10/8/2015
Discovery Opens	10/8/2015
Initial Disclosures Due	11/7/2015
Expert Disclosures Due	3/6/2016
Discovery Closes	4/5/2016
Plaintiff's Pretrial Disclosures	5/20/2016
Plaintiff's 30-day Trial Period Ends	7/4/2016
Defendant's Pretrial Disclosures	7/19/2016
Defendant's 30-day Trial Period Ends	9/2/2016
Plaintiff's Rebuttal Disclosures	9/17/2016
Plaintiff's 15-day Rebuttal Period Ends	10/17/2016

DATE: September 1, 2015

Respectfully Submitted,

/s/ Darlene Ghavimi

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*Attorneys For Townsquare Commerce, LLC*

**CERTIFICATE OF CONSENT**

I hereby certify that I obtained consent from Charles E. Phipps, representing Groupon, Inc., to file this Consent Motion to Extend Answer Date on Friday, August 28, 2015 via E-mail.

/s/ Darlene Ghavimi

Darlene Ghavimi

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Registrant's Motion to Suspend Proceedings Pending Outcome of Civil Action has been served on counsel of record for Groupon by E-mail and first class mail, Certified Return Receipt Requested, on September 1, 2015.

Charles E. Phipps  
Robert E. Nail  
Paul D. Lein  
Locke Lord LLP  
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Dallas, TX 75201-6776

/s/ Darlene Ghavimi

Darlene Ghavimi